

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
Oct 15 4 49 PM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

DMA's DESIGNATION OF WRITTEN
CROSS-EXAMINATION OF USPS WITNESS MODEN

The Direct Marketing Association, Inc. designates the following
interrogatory responses as written cross-examination of USPS witness Moden:

ABA&EEI&NAPM/USPS-T25: 28

ABP/USPS-T4: 8, 9, 14

ADVO/USPS-T41: 7

DFC/USPS-T4: 4, 5, 11

DMA/USPS-T4: 1-4, 7-19, 21, 22, 23(a)(c), 24(a)-(b) & (f)-(h), 25, 26,
28(b)-(f), 30(a)-(d) & (f)-(i), 31, 34, 39-42, 44, 46, 48, 51, 52, 54-56,
60-62, 85(a)(c)(e) & (f), 86, 87, 89-94, 96

DMA/USPS-T14: 1, 7, 23c

MPA/USPS-T4: 3-5, 10-13

NAA/USPS-T4: 1, 2, 4, 5, 7, 11, 13-15, 19, 21, 22

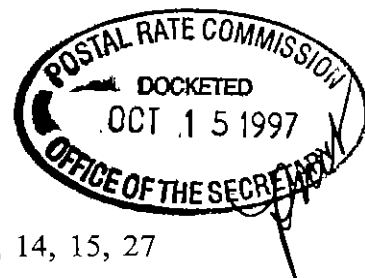
NDMS/USPS-T4: 4, 13

NDMS/USPS-T28: 15, 16

NDMS/USPS-T32: 21, 23

OCA/USPS-T4: 1, 5, 7, 8(a)-(b), 9, 10(a) & (c)-(f), 12, 14, 15, 27

OCA/USPS-T32: 56(c)

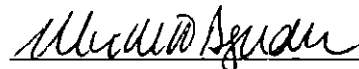


TW/USPS-T4: 1, 3(a)-(c) & (e), 5, 7, 9, 11, 14, 16, 26-31

UPS/USPS-T4: 1

UPS/USPS-T14: 44, 58

Respectfully submitted,



Dana T. Ackerly II

David L. Meyer

Michael D. Bergman

COVINGTON & BURLING

1201 Pennsylvania Avenue, N.W.

P.O. Box 7566

Washington, D.C. 20044

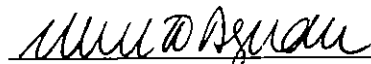
(202) 662-5296

Counsel for the Direct Marketing
Association, Inc.

Dated: October 15, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commissioner's Rules of Practice, as modified by the Special Rules of Practice.



Michael D. Bergman

Dated: October 15, 1997